

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:

Caron Olevia Neary-Carothers

Debtor

Case No. 19-30337-KLP
Chapter 7

RESPONSE TO ORDER TO SHOW CAUSE WHY CASE IS PROPERLY FILED IN
CURRENT VENUE

COMES NOW the Debtor, Caron Olevia Neary-Carothers, by counsel, and she hereby files this response to the Order to Show Cause issued by this Honorable Court on January 29, 2019, and she states as follows:

1. The Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy code on January 22, 2019.
2. The Debtor currently resides at her parents' residence at 1506 Bills Creek Boulevard, Winfield, West Virginia 25213, where she has primarily resided for the better part of the last two years.
3. Prior to moving to West Virginia to care for her parents, the Debtor lived in a house owned jointly with her husband, located at 3142 Grayland Avenue, Richmond, VA 23221. The Debtor and her husband continue to own that property as tenants by the entirety. The city parcel information is attached as **Exhibit 1**.
4. The Debtor does not own any other property with substantial value outside of the City of Richmond. Aside from her clothing and a few personal effects, all of the Debtor's property has been located in Richmond, Virginia since 2006.

WHEREFORE, and for the foregoing reasons, the Debtor respectfully moves this Honorable Court to dismiss the Show Cause and to grant such other relief as may be appropriate.

Respectfully submitted,

CARON OLEVIA NEARY-CAROTHERS
By Counsel

NEW DAY LEGAL, PLLC

/s/ Scott W. Carpenter
Scott W. Carpenter, Esquire, VSB # 89057
John C. Morgan, Esquire, VSB # 30148
Suad Bektic, Esquire, VSB # 90012
98 Alexandria Pike, Suite 10
Warrenton, VA 20186
(540) 349-3232

(FAX) 349-1278
Counsel for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of February, 2019, a true copy of the foregoing Response to Show Cause was mailed, first class postage paid, or via the CM/ECF system to:

Caron Olevia Neary-Carothers
1506 Bills Creek Road
Winfield, WV 25213
Debtor

Suzanne E. Wade
P.O. Box 1780
Richmond, VA 23218
Chapter 13 Trustee

Robert B. Van Arsdale
Office of the U. S. Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219